

Danner, Ward

From: Huetteman, Tom
Sent: Wednesday, August 06, 2014 8:05 AM
To: Santos, Carmen; Armann, Steve
Subject: FW: Note to our RA

Follow Up Flag: Follow up
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Categories: Green Category

FYI – I will let you know what Mary has to say.

Tom Huetteman, Assistant Director
RCRA Branch, Land Division, USEPA Region 9
415-972-3751

From: Huetteman, Tom
Sent: Wednesday, August 06, 2014 8:02 AM
To: Sanderson, Mary
Subject: Note to our RA

Mary,

As you can see below in this note sent to our RA, our local activist is saying that your approach is not to look at air or dust levels to assess public health exposures and not to manage in place (such as allowing up to 15 years for removal). When you are back, let's talk about how we can respond to this. Thanks, Tom

Tom Huetteman, Assistant Director
RCRA Branch, Land Division, USEPA Region 9
415-972-3751

From: Scott, Jeff
Sent: Wednesday, August 06, 2014 7:20 AM
To: Huetteman, Tom
Subject: Fw: How to test for PCBs

From: Jennifer DENICOLA <jendenicola@gmail.com>
Sent: Tuesday, August 5, 2014 11:10:21 PM
To: Blumenfeld, Jared; Scott, Jeff
Subject: How to test for PCBs

<http://www.maineindoorair.org/Fragala%20Managing%20PCB%20Presentation%202010%20Maine%20IAQ%20Handouts.pdf>

During our conversation today, we discussed how other regions test for and assess PCB contamination. EH&E has been asked to speak to the EPA many times over the past 10 years. They have been hired to assess PCBs in many schools including the Univ of Mass that Environ refers to in their plan. As you can see from this presentation, Univ of Mass is the example. The most important slide is as follows. This is the approach taken by

region 1. In fact they have gone as far as making it very well known to Boston contractors that they must test for PCBs and look out for them during any work they do.

I hope you enjoy this.

Respectfully,
Jennifer deNicola

Building Characterization

- Determine the nature and extent of PCB caulking in a building
- Sampling suspect caulking materials
- Characterizing the levels of PCBs in surrounding materials

Most Important Stage!



Manage in Place?

- Unlike asbestos, the EPA does **not** have a “manage in place” regulatory approach for these unauthorized PCB products.
 - Once PCBs are identified, they must be taken out of service.
- Guidance is available on managing the risk of PCB caulk and potential exposures



PCB Remediation Strategy

5 Steps

1. Building Characterization
2. Remediation Plan Development
3. Pilot Remediation Program
4. Remediation Program
5. Testing and Verification

